

Telephone Discussion with Dan Vornberg of DOE RUN Smelting Facility in Missouri on February 9, 1995

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Mr. Vornberg would decide by tomorrow if he would send a letter to U.S. EPA (Attn: Brad Bradley) confirming that DOE RUN was not presently in a position to place a bid on the Taracorp pile given the uncertainty of the economics, available technology and regulatory status, and that clearly any costs would not be competitive with on-site capping.

Below are the major points of our discussion:

- While specific costs estimated have not been developed by DOE RUN for processing the Taracorp pile, the facility could not compete with costs of on-site capping. Costs will be more similar to that for off-site disposal. Doe Run is in no position currently to bid on the disposal of the pile.
- It is not clear if technology exists to process the "wastes" in the pile. For example, the hard rubber battery-case material in the pile will not be processed in the furnace; it will need to be separated and disposed of elsewhere.
- It is still not evident whether DOE RUN would be able to process the waste in their furnace from a regulatory standpoint. Acceptance is based upon a premise that DOE RUN would be able to blend feed materials to "dilute" the high organic content laden (>10,000 ppm) material to an acceptable level, and that the wastes do not contain RCRA listed wastes. [The dilution ratio to get the organic materials within acceptable limits would have to be at least 20 parts of other feed material to 1 part of Taracorp pile material thereby increasing the volume to be processed.] Finally, acceptance is based upon the premise that the furnace can accept materials which contain trace amounts of any metal even if the furnace does not have a BIF interim status permit.
- IF DOE RUN were capable of processing the pile, the pile would need to be removed from Granite City slowly over several decades or stored at Doe Run for several decades while the pile was processed. If the pile was stored on the DOE RUN site additional costs would be incurred to build a storage unit at DOE RUN. Furthermore, it is not clear whether DOE RUN would be able to get the necessary storage permits. Finally the pile would, in essence, be transferred from one community to another community.
- DOE RUN has not even considered processing the other pile and contamination on the Taracorp main industrial area due to technical problems with those wastes. The SLLR pile

(8,000 cubic yards) is comprised of black hard rubber battery chip pile, and the rest of the contamination has a lead content below 1 %. EPA's preferred remedy and the associated cost estimates fully consider these areas.

#### Other Facts

DOE RUN has lost interim status for the furnace to operate as a BIF. Hence, it can only take wastes which are exempted from the BIF requirement (see letter from Region 7). The DOE RUN facility is currently undergoing corrective action to address its releases of hazardous constituents to the environment as required by its RCRA Part B permit. The DOE RUN facility has its own 150,000 ton waste pile from its primary smelter that it has not yet dealt with. The facility is located in a quasi-residential area / commercial area; residents are located within 1 mile of the facility